

I. NEEL CHATTERJEE (STATE BAR NO. 173985)  
nchatterjee@orrick.com  
MONTE M.F. COOPER (STATE BAR NO. 196746)  
mcooper@orrick.com  
THERESA A. SUTTON (STATE BAR NO. 211857)  
tsutton@orrick.com  
MORVARID METANAT (STATE BAR NO. 268228)  
mmetanat@orrick.com  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
1000 Marsh Road  
Menlo Park, CA 94025  
Telephone: 650-614-7400  
Facsimile: 650-614-7401

Attorneys for Plaintiff  
FACEBOOK, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

FACEBOOK, INC.,

Plaintiff,

v.

POWER VENTURES, INC. a Cayman Island  
Corporation; STEVE VACHANI, an  
individual; DOE 1, d/b/a POWER.COM,  
DOES 2-25, inclusive,

Defendants.

Case No. 5:08-cv-05780 JW

**[PROPOSED] ORDER GRANTING  
FACEBOOK INC.'S MOTION TO  
COMPEL DEFENDANTS TO  
PERFORM THOROUGH SEARCH  
FOR RESPONSIVE DOCUMENTS  
AND FOR PRODUCTION THEREOF**

Date: October 24, 2011  
Time: 9:00 A.M.  
Judge: Honorable James Ware  
Courtroom: 8, 4th Floor

1 The Court, having considered Facebook, Inc.'s Motion to Defendants to Perform  
2 Thorough Search for Responsive Documents And For Production Thereof, the papers filed in  
3 support of said motion, and the papers filed in opposition by Power Ventures and Steve Vachani,  
4 hereby GRANTS Facebook's Motion to Compel:

5 Power Ventures and Steve Vachani shall, within 10 days of this Order,:

6 (i) perform a thorough search of all available repositories  
7 for information using a proper search and collection protocol agreed  
upon by the parties;

8 (ii) produce all materials relevant to Facebook's discovery  
9 requests, and supplement responses accordingly; and

10 (iii) provide a declaration stating how defendants performed  
11 their search for responsive materials, including identifying the  
sources searched, who conducted the search, and specifying what  
was the search methodology.

12 To the extent defendants contends no responsive documents exist, despite a thorough  
13 search, defendants shall provide a declaration in conformance with subsection (iii) above and  
14 further certify that no documents exist.

15 **IT IS SO ORDERED.**

16  
17 Dated:

18  
19 \_\_\_\_\_  
Honorable James Ware  
United States Chief Judge  
20  
21  
22  
23  
24  
25  
26  
27  
28